

Brian C. Rocca, S.B #221576
brian.rocca@morganlewis.com

Sujal J. Shah, S.B #215230
sujal.shah@morganlewis.com

Michelle Park Chiu, S.B #248421
michelle.chiu@morganlewis.com

Minna Lo Naranjo, S.B #259005
minna.naranjo@morganlewis.com

Rishi P. Satia, S.B #301958
rishi.satia@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105
Telephone: (415) 442-1000
Facsimile: (415) 422-1001

Richard S. Taffet, pro hac vice
richard.taffet@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP
101 Park Avenue
New York, NY 10178
Telephone: (212) 309-6000
Facsimile: (212) 309-6001
Attorneys for Defendants Google LLC, et al

Daniel M. Petrocelli, S.B. #97802
dpetrocelli@omm.com
Stephen J. McIntyre, S.B. #274481
smcintyre@omm.com
O'MELVENY & MYERS LLP
1999 Avenue of the Stars
Los Angeles, California 90067
Telephone: (310) 553-6700
Facsimile: (310) 246-6779

Ian Simmons, pro hac vice
isimmons@omm.com
Benjamin G. Bradshaw, S.B. #189925
bbradshaw@omm.com
O'MELVENY & MYERS LLP
1625 Eye Street, NW
Washington, DC 20006
Telephone: (202) 383-5300
Facsimile: (202) 383-5414

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

Epic Games Inc. v. Google LLC et al., Case No. 3:20-cv-05671-JD

In re Google Play Consumer Antitrust Litigation, Case No. 3:20-cv-05761-JD

In re Google Play Developer Antitrust Litigation, Case No. 3:20-cv-05792-JD

State of Utah et al. v. Google LLC et al., Case No. 3:21-cv-05227-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF BRIAN C. ROCCA
IN SUPPORT OF STIPULATION AND
[PROPOSED] ORDER RE: DEADLINE
FOR GOOGLE'S RESPONSIVE
PLEADINGS TO COMPLAINTS**

Judge: Hon. James Donato

1. I am a partner at Morgan, Lewis & Bockius LLP, counsel of record for
 2 Defendants Google LLC, Google Ireland Limited, Google Commerce Ltd., Google Payment
 3 Corp., Google Asia Pacific Pte. Ltd., and Alphabet Inc. (“Defendants” or “Google”) in this
 4 multi-district litigation (MDL). I am a member in good standing of the State Bar of California
 5 and admitted to practice in the state and federal courts of California. I respectfully submit this
 6 declaration pursuant to Local Rule 6-2(a) in support of Parties’ Stipulation and [Proposed] Order
 7 Re: Deadline for Google’s Deadline For Google’s Responsive Pleadings to Complaints. I have
 8 personal knowledge of the facts or circumstances set forth herein. If called upon as a witness in
 9 this action, I could and would testify competently thereto.

10. 2. On July 21, 2021, Epic Games, Inc., Developer Plaintiffs, and Consumer
 11 Plaintiffs filed amended complaints against Google. MDL ECF No. 62-64.

12. 3. On July 7, 2021, certain States filed a complaint against Google. Case No. 21-
 13 cv-05227-JD, ECF No. 1. That case was related to the other actions in the MDL. Case No. 21-
 14 cv-05227-JD, ECF Nos. 35, 37.

15. 4. On August 13, 2021, Parties filed a joint case management statement proposing a
 16 briefing schedule in which Google’s Motions to Dismiss all four complaints would be due on
 17 September 8, 2021, Plaintiffs’ Oppositions would be due on October 15, 2021, and Google’s
 18 Reply would be due on November 2, 2021. MDL ECF No. 77.

19. 5. On August 17, 2021, the Court entered an order approving the Parties’ proposed
 20 briefing schedule and setting the hearing on Google’s Motions to Dismiss for November 18,
 21 2021. MDL ECF No. 78.

22. 6. In lieu of moving to dismiss, Google has elected to file responsive pleadings to
 23 the four complaints.

24. 7. On September 7, 2021, I contacted counsel for Plaintiffs in each of the four
 25 actions in the MDL to inform them of Google’s decision to file responsive pleadings to the
 26 complaints. Each counsel confirmed that their clients would stipulate to October 11, 2021 as the
 27 deadline for Google to file responsive pleadings to the complaints.

1 8. Other than vacating all deadlines associated with the motions to dismiss, an order
2 approving the Parties' stipulation as to the deadline for Google's filing of responsive pleadings
3 will not alter any other deadlines already fixed by Court order.

4 9. This is the first extension requested by Google regarding its responsive pleadings
5 to any of the complaints in this MDL.

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7 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
8 8th day of September, 2021 in San Francisco, California.

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11 Brian C. Rocca

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